

AgriSystems International™

125 West Seventh Street
Wind Gap, Pennsylvania 18091 USA

The Organic Consultants
A Company of LVOG Inc.

Telephone: 610 863-6700
Facsimile: 610 863-4622

E-Mail: agrisys1@aol.com

November 14, 2005

Mr. Arthur Neal
Director of Program Administration
NATIONAL ORGANIC PROGRAM
United States Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Email

Reference Document Number TMD – 04-01

Dear Mr. Neal

We work with producers and handlers of certified organic livestock and consumer-ready products – and support the use of *peracetic acid in and/or on products labeled **Organic***.

Therefore we are requesting the *National Organic Program (NOP)* to permit the use of:

Peracetic Acid/Peroxyacetic Acid – 205.605(b)

“For use in wash and/or rinse water according to FDA Limitations. For use as a sanitizer on food contact surfaces on agricultural products labeled - Organic”.

And:

Peracetic Acid/Peroxyacetic Acid (205.603(a))

For the use in/or on facilities and processing equipment sanitation (barns, milking parlors, processing areas).

Clearly this was the intent of the *National Organic Standards Board (NOSB)* unanimous vote and recommendations to place “*Peracetic Acid on the National List of Materials for Livestock and Handling*” as was done for *Organic Crops*.

We appreciate your reconsideration and action relative to our request and look forward to a change of status of *Peracetic Acid for the use of in/or on agricultural products labeled “Organic”* in the **Final Rule**. Thank you.

Very truly yours,

AGRISYSTEMS INTERNATIONAL

Thomas B. Harding, Jr.
President

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Mr. Arthur Neal
Director of Program Administration
National Organic Program
UNITED STATES DEPARTMENT OF AGRICULTURE
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Email

Re: Reference Document Number TMD-04-01

Dear Mr. Neal

We work with organic manufacturers and handlers of organic ingredients and consumer-ready meatless products – and therefore support – **Tetrasodium Pyrophosphate (TSPP) CAS #7722-88-5** – *for use in meat analog products labeled “Organic”*.

This was clearly the intent of the *National Organic Standards Board (NOSB)* and their two (2) positive votes and recommendation(s) to place *Tetrasodium Pyrophosphate (TSPP)* on the *National List 205.605(b) – Synthetic allowed. For use in meat analog products*.

We appreciate your reconsideration and action relative to our request and look forward to a change of status whereas – *Tetrasodium Pyrophosphate 205.605(b) For use in meat analog products, labeled “Organic”* in the **Final Rule**.

Thank you.

Very truly yours,

AGRISYSTEMS INTERNATIONAL

Thomas B. Harding, Jr.

President

cc: MGP Ingredients, Inc.